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Honorable Marc Barreca  
Chapter 7  
Location: Seattle  
Hearing Date: June 23, 2021  
Time: 10:00 AM

5  
6 UNITED STATES BANKRUPTCY COURT  
7 FOR THE WESTERN DISTRICT OF WASHINGTON

8 IN RE: ) Chapter 7 Proceeding  
9 )  
10 BARBARA WEED, ) Case No. 21-10431-MLB  
11 )  
12 ) *Debtor.* )  
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COMES NOW Debtor, Barbara Weed, by counsel in reply to the chapter 7 trustee's objection to conversion of this case to chapter 13.

1. The Debtor did not file her motion to convert in bad faith. She did not file this motion to 'run out the clock' on the statute of limitations on an avoidance action. The chapter 13 trustee commonly has debtors sign waivers of the limitations defense and Debtor would certainly do so in this case.

2. The Debtor fully disclosed to the trustee at the creditor meeting that she transferred 892 N. Lake Samish Dr, Bellingham, Washington to her son Cortney Kinman and his wife Megan. It doesn't make sense that she disclosed that but intentionally concealed other transfers of the same property.

3. There are valid and reasonable explanations for all the discrepancies in her bankruptcy schedules.

4. Debtor's new counsel sent a letter to chapter 7 trustee's after substituting in the case asking her to contact him if she had any questions. The only response received was an email

REPLY TO TRUSTEE'S OBJECTION  
TO MOTION TO CONVERT

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1 from Ms. Ellis stating she thought the motion was premature as only \$8k in unsecured claims  
2 have been filed and she thought the Debtor did not have the income to fund a plan.

3 5. Converting this case to chapter 13 makes more sense. The Debtor can pay the claims  
4 which are currently \$26,475.11. Counsel advised Ms. Ellis the Debtor would pay 100% of all  
5 filed and allowed claims, including any claim filed by the chapter 7 trustee's for fees and costs  
6 she has incurred in this case.

7 WHEREFORE the Debtor prays for an order converting this case from a case under  
8 Chapter 7 to a case under Chapter 13.

9  
10 Date: 06/18/2021

/s/ Steven C. Hathaway

11 Steven C. Hathaway, Attorney for Debtor

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14 DECLARATION OF MAILING

15 THE UNDERSIGNED CERTIFIES UNDER PENALTY OF PERJURY THAT  
16 ON 06/18/2021 THE UNDERSIGNED CAUSED TO BE DELIVERED EITHER  
17 BY FIRST CLASS MAIL, LEGAL MESSENGER OR ELECTRONICALLY A  
18 COPY OF THIS DECLARATION TO THE U.S. TRUSTEE, THE CHAPTER 7  
19 TRUSTEE AND COUNSEL FOR THE CHAPTER 7 TRUSTEE.  
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23 Dated: 06/18/2021

/s/ Simone M. Hathaway

24 Simone M. Hathaway, Legal Assistant